

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

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CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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MARK PURIFICATI, hereby declares and verifies the truth of the following, under
penalty of perjury under the laws of the United States of America, pursuant to Title 28, United States
Code, Section 1746:

Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF
MARK PURIFICATI**

1. I am an independent contractor for defendant IME Companions LLC (“Companions”), and I am fully familiar with the facts set forth herein.

2. I have been informed that Rebecca Roth (“Roth”) has submitted an affidavit to this Court stating that I “approached” her on two separate occasions at medical offices where she had been assigned to attend an IME on behalf of IME Watchdog, Inc. (“Watchdog”). I dispute Roth’s allegations and resent plaintiff’s allegation that I engaged in any conduct which violated any Court Order.

3. My recollection is that I was approached and asked questions by a strange woman while with my client and her husband at a doctor’s office on East 15th Street in Brooklyn. I later learned that this woman was Roth. I had to explain to my client that this “woman” was neither my friend nor business associate because her questioning of me was so intrusive. The woman’s conduct was so strange that I noted our meeting in a personal note. My note states in part: “Weird creepy old lady keeps talking to me from watchdog.” A redacted copy of my personal note from October 27, 2022, is annexed as Exhibit “A.”

4. I did not “approach” Roth. She approached me. I told her that my name was “John” because I did not wish to reveal my identity or the company for which I was working. I do not recall telling her that I was working for Companions.

5. While we did engage in some small talk about work such as how many IME’s we were doing, the conversation was initiated by Roth. I do not recall asking Roth any probing questions about her work for Watchdog. I did not even know that Roth worked for Watchdog, until she told me. I might have mentioned my desire to move to Florida to open a franchise, but I was not

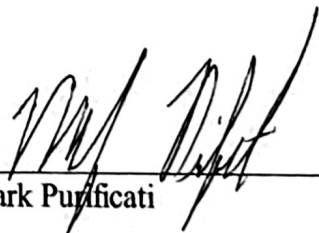
attempting to recruit Roth. We were just engaged in small talk. Nor do I recall telling Roth that my "boss" was helping me move to Florida.

6. When I saw Roth for a second time on October 28, 2022, I was entering the medical office as she was leaving it. Our conversation was seconds in duration.

7. I did not speak with Roth at the behest of Companions or anyone associated with Companions, and I did so only because Roth approached and questioned me. We engaged in nothing more than brief conversations which are commonplace when people who work in the same industry meet in the field.

8. Tiffany Uribe was not with me when these conversations occurred.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 16, 2023.



Mark Purificati

Sworn to before me this
16th day of March, 2023



NOTARY PUBLIC

JOSEPH V. DeGAETANO
Notary Public, State of New York
No. 01DE4981091
Qualified in Putnam County
Commission Expires on October 26th, 2023